

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

**MDL No. 2804
Case No. 17-md-2804
Judge Dan Aaron Polster**

This document relates to:

*The County of Cuyahoga v. Purdue
Pharma L.P., et al.*, Case No. 17-OP-45004

*The County of Summit, Ohio, et al. v.
Purdue Pharma L.P. et al.*,
Case No. 18-OP-45090

**DECLARATION OF JENNIFER D. CARDELUS IN SUPPORT OF DEFENDANTS'
MOTION TO EXCLUDE EXPERT TESTIMONY OF LACEY KELLER**

I, Jennifer D. Cardelus, declare as follows:

1. I am an attorney at O'Melveny & Myers, counsel for O'Melveny & Myers LLP and counsel of record for Defendants Johnson & Johnson, Janssen Pharmaceuticals, Inc., Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc. (collectively "Janssen") in the above captioned case.

2. I submit this declaration in support of Defendants' Motion to Exclude Expert Testimony of Lacey Keller.

3. Attached as Exhibit 1 is a true and correct copy of excerpts from the deposition of Lacey Keller, taken on June 13, 2019, in New York, New York.

4. Attached as Exhibit 2 is a true and correct copy of the April 15, 2019 Expert Report of Lacey Keller.

5. Attached as Exhibit 3 is a true and correct copy of the April 15, 2019 Expert Report of James Rafalski.

6. Attached as Exhibit 4 is a true and correct copy of excerpts from the deposition of James Rafalski taken on May 13, 2019, in Detroit, Michigan.

7. Attached as Exhibit 5 is a true and correct copy of excerpts from the deposition of James Rafalski taken on May 14, 2019, in Detroit, Michigan.

8. Attached as Exhibit 6 is a true and correct copy of excerpts from the deposition of Thomas Prevoznik taken on April 17, 2019, in Washington, D.C.

9. Attached as Exhibit 7 is a true and correct copy of excerpts from the deposition of Thomas Prevoznik taken on May 17, 2019, in Washington, D.C.

10. Attached as Exhibit 8 is a true and correct copy of excerpts from the deposition of Joseph Rannazzisi taken on April 26, 2019, in Washington, D.C.

11. Attached as Exhibit 9 is a true and correct copy of excerpts from the deposition of Joseph Rannazzisi taken on May 15, 2019, in Washington, D.C.

12. Attached as Exhibit 10 is a true and correct copy of excerpts from the deposition of Kyle Wright taken on February 28, 2019, in Washington, D.C.

13. Attached as Exhibit 11 is a true and correct copy of the May 31, 2019 Expert Report of Larry Holifield.

14. Attached as Exhibit 12 is a true and correct copy of the December 14, 2018 Letter from Joshua M. Davis to Peter H. Weinberger, Steven J. Skikos, and Troy A. Rafferty in relation to the above-captioned case.

15. Attached as Exhibit 13 is a true and correct copy of the May 10, 2019 Expert Report of Edward Buthusiem.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this Declaration was executed in Los Angeles, California on June 28, 2019.

/s/ Jennifer D. Cardelus

Jennifer D. Cardelus

CERTIFICATE OF SERVICE

I hereby certify that on June 28, 2019, a copy of the foregoing **DECLARATION IN SUPPORT OF DEFENDANTS' MOTION TO EXCLUDE EXPERT TESTIMONY OF LACEY KELLER** was served electronically on the parties.

Dated: June 28, 2019

/s/ Jennifer D. Cardelus
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